

LAW OFFICES OF JOANNE WILLIS NEWTON  
A PROFESSIONAL CORPORATION

June 30, 2017

**BY EMAIL TO Vannice\_Doulou@nigc.gov**

National Indian Gaming Commission  
Attn: Vannice Doulou  
1849 C St. NW  
Mailstop #1621  
Washington, DC 20240

RE: Comments on Draft Class III MICS Guidance

Dear Ms. Doulou:

I am writing on behalf of my client, the Pauma Gaming Commission the tribal gaming agency of the Pauma Band of Mission Indians, to express the Pauma Gaming Commission's support for the NIGC's proposal to suspend 25 C.F.R. Part 542, which will preserve the text of the regulation in the Code of Federal Regulations but clarify that the regulation is not enforceable.

The Pauma Gaming Commission supports the publication of Class III MICS as non-binding guidelines because it is one of the California tribes that chosen the NIGC alternative compliance option under the California Gambling Control Commission's regulation CGCC-8. This option allows California gaming tribes to avoid application of CGCC MICS standards and CGCC compliance verification inspections when the tribe's gaming laws provide for NIGC monitoring and enforcement of the MICS set out in 25 C.F.R. Part 542 (as in effect in 2006 or as amended).

The Pauma Gaming Commission looks forward to continuing to collaborate with the NIGC on Class III MICS compliance inspections and reviews on a voluntary government-to-government basis.

Sincerely,



Joanne Willis Newton

encls.

c.c.: Alex Sanchez, Executive Director, Pauma Gaming Commission